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SC

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

KEITH I. SCHORR and SUSAN SCHORR,
In their own right and as personal
representatives of the Estate of RYAN K.
SCHORR,

Plaintiffs,

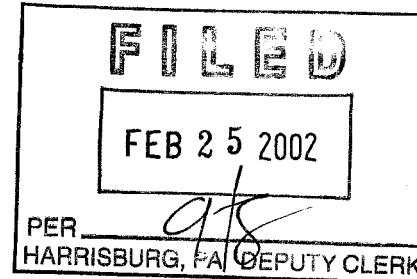
vs.

No. 1:CV-01-0930

J. Cane

WEST SHORE REGIONAL POLICE
COMMISSION, HOWARD DOUGHERTY,
CUMBERLAND COUNTY, ROBERT
GORIL and HOLY SPIRIT HOSPITAL,

Defendants.



STIPULATION OF CONFIDENTIALITY

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned,
that:

1. As used herein, the following words are defined as follows:

(a) "this case" or "this litigation" shall mean the civil action captioned

Keith I. Schorr and Susan Schorr, in their own right and as personal representatives of the Estate of Ryan K. Schorr v. West Shore Regional Police Commission, Howard Dougherty, Cumberland County, Robert Goril and Holy Spirit Hospital, United States District Court for the Middle District of Pennsylvania, Civil Action No. 1:CV-01-0930;

(b) "the parties" shall mean the Plaintiffs Keith I. Schorr and Susan Schorr and Defendants West Shore Regional Police Commission, Howard Dougherty, Cumberland County, Robert Goril and Holy Spirit Hospital;

(c) "this Court" or "Court" means the United States District Court for the Middle District of Pennsylvania; and

(d) "disclosed," "furnished" or "submitted" means, without limitation, divulged, revealed, produced, described, transmitted or otherwise communicated, in whole or in part.

2. All documents contained within the personnel file ("personnel file") of West Shore Regional Police Commission Officers Gary Berresford and Harry Hart, which are disclosed, furnished or submitted, either voluntarily or pursuant to Court order, by or on behalf of any party to any other party in this litigation, whether or not designated confidential, shall be used solely in connection with pretrial proceedings, preparation for trial, trial or other proceedings in this litigation.

3. Such personnel file shall be treated as confidential and shall not be disclosed to any person other than:

- (a) Counsel for the parties in this case;
- (b) Necessary secretarial and clerical personnel assisting counsel for the parties in this case;
- (c) Qualified persons taking testimony involving such documents, and necessary stenographic and clerical personnel thereof;
- (d) Technical experts, and their staff, who are employed for the purpose of this case;
- (e) The parties and those officers, directors, partners and managing agents of a party who are charged with controlling this action on behalf of that party; and

(f) The Court, officers of the Court and any other personnel as is authorized by the Court.

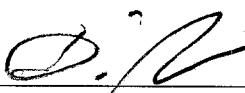
4. When any personnel file is included in any authorized transcript of a deposition or the exhibits thereto, arrangements shall be made by the party noticing the deposition with the court reporter taking the deposition to bind the transcript and label it "CONFIDENTIAL."

5. If, during trial or in connection with any motion or other proceeding, any party intends to offer into evidence any information or documents from the personnel file, counsel for the offering party shall give advance notice to counsel for the party which disclosed such information, before offering same into evidence.

6. The inadvertent disclosure of confidential information by any party shall not be construed as a waiver of confidentiality.

7. The parties hereto reserve the right to apply to the Court for an order seeking further protection against discovery or other use of confidential documents.

Date: 2/19/02



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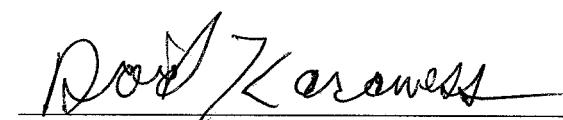


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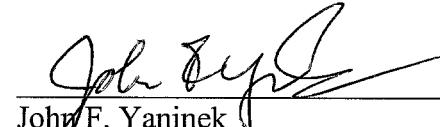


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